



# **Air Quality Permitting Statement of Basis**

**January 24, 2005**

**PTC/Tier II Operating Permit No.: T2-040324**

**ConAgra Foods Packaged Foods Company, Inc.  
American Falls**

**Facility ID No. 077-00017**

**Prepared by:**

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AIR QUALITY DIVISION**

**FINAL PERMIT**

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## Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## **1. PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.400 Rules for the Control of Air Pollution in Idaho, for issuing permits to operate and the requirements of IDAPA 58.01.01.200 for issuing permits to construct.

## **2. FACILITY DESCRIPTION**

ConAgra Foods Packaged Foods Company, Inc. (CFPFCI) is a potato processing company. Products include frozen fried potato products and hash browns, and dehydrated potato flakes. The facility operates two frozen fried product lines, a dehydrated flake product line, and two specialized product lines. The frozen fried product lines are referred to as Lines 1 and 2 and consist of a dryer and a fryer and each line is controlled by a wet scrubber. The dehydrated flake product line consists of two dryers and a pneumatic material handling system with three baghouses. Lines 3 and 5 are the specialized product lines. Line 3 consists of a dryer and a roaster, and Line 5 contains a dryer and two fryers.

Process steam and hot water are supplied by four boilers. Boilers 1, 2, and 3 are fired on either natural gas, distillate fuel oil, or vegetable oil, and are rated at 98.5 MMBtu/hr, 47.2 MMBtu/hr, and 46.7 MMBtu/hr heat input, respectively. Boiler 4 is fueled exclusively by natural gas and is rated at 2.5 MMBtu/hr heat input.

Natural gas-fired space heaters provide heated make-up air at the facility. Aggregated heat input capacity is 79.7 MMBtu/hr.

## **3. FACILITY / AREA CLASSIFICATION**

CFPFCI is defined as a synthetic minor facility because, CFPFCI, without permit limits on the potential to emit, the CO and NO<sub>x</sub> emissions would each exceed 100 tons per year. The AIRS classification is "SM" because the potential to emit is limited to less than major source levels.

The facility is located within AQCR 61 and UTM zone 12. The facility is located in Power County which is designated and unclassifiable for all criteria pollutants (PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, lead, and ozone).

The AIRS information that was contained in the July 31, 2002 PTC/Tier II permit remains unchanged for this Tier II permit.

## **4. APPLICATION SCOPE**

The application requests a name change for the permittee due to corporate reorganization. The same corporate entity retains ownership and control so this is project is a true name change request. This facility was previously permitted under the name of Lamb-Weston, Inc., a subsidiary of ConAgra Foods, Inc. The official name for the facility is now "ConAgra Foods Packaged Foods, Inc." The change is for an existing PTC/Tier II permit issued on July 31, 2002.

### **4.1 Application Chronology**

December 13, 2004	PTC application received.
January 4, 2005	Application certification received.
January 5, 2005	Corporate and facility representatives contacted by telephone and review of facility draft offered. Facility draft review was declined.

January 5, 2005	Contacted Pocatello Regional Office. Name change application materials faxed to regional office. Review of tech memo and permit offered.
January 6, 2005	Application declared complete.
January 6, 2005	Received comment on the permit from Rick Elkins, Pocatello Regional Office.

## **5. PERMIT ANALYSIS**

This section of the Statement of Basis describes the regulatory requirements for this Tier II permitting action:

### **5.1 Equipment Listing**

No equipment is being modified or constructed for this project.

### **5.2 Emissions Inventory**

An emissions inventory is not applicable for this project.

### **5.3 Modeling**

Modeling is not required for this project.

### **5.4 Regulatory Review**

This section describes the regulatory analysis of the applicable air quality rules with respect to this Tier II/PTC air permit.

IDAPA 58.01.01.404.04 ..... Procedure For Issuing Permits—Permit Revision or Renewal

This project only involves changing the name that the facility does business as, it does not involve a change in ownership of the facility. It is being processed as a permit revision. None of the permit conditions change, nor do the regulations which are applicable to the facility change.

### **5.5 Fee Review**

Permit to construct application fees are not required for name changes in accordance with IDAPA 58.01.01.224 and neither PTC or Tier II permit processing fees are required for name changes in accordance with IDAPA 58.01.01.225 and IDAPA 58.01.01.407.02.c.

## **6. PERMIT CONDITIONS**

No permit conditions are changed from the original PTC/Tier II permit issued on July 31, 2002 to Lamb Weston except for the name change.

## **7. PUBLIC COMMENT**

A public comment period is not required for revised Tier II operating permits in accordance with IDAPA 58.01.01.404.04 because there is no change in ownership, facility operations or emissions. A permit to construct is not required because the facility is not commencing construction or modification. Since a permit to construct is not required a public comment period is also not required in accordance with IDAPA 58.01.01.209.c.

## **8. RECOMMENDATION**

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that CFPFCI be issued a PTC/Tier II permit for the name change from Lamb Weston, Inc., to "ConAgra Foods Packaged Foods Company, Inc. doing business as Lamb-Weston Foods and ConAgra Foods" as requested by the permittee. No public comment period is required and the project does not involve PSD requirements.

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